

Los Angeles Unified School District

Office of Environmental Health and Safety

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NOTICE OF EXEMPTION

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FEB 26 2018
PLACE
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LOS ANGELES COUNTY CLERK
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To: County Clerk and Registrar-Recorder
County of Los Angeles
12400 Imperial Highway
Norwalk, CA 90650

From: LAUSD OEHS
333 South Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

Holmes Avenue Elementary School Wellness Center

Project Location – Specific:

The Holmes Avenue Elementary School (ES) Wellness Center project (Project) will be located on the 2.88-acre Holmes Avenue ES campus. Holmes Avenue ES is located at 5108 Holmes Avenue, Los Angeles, California. The campus is bound by East 51st Street to the north; train tracks and Alameda Avenue to the east; East 52nd Street to the south; and Holmes Avenue to the west. The school is surrounded by multifamily residential properties to the north, south, and west and is separated from an industrial area to the east by railroad tracks and Alameda Street. The Project will occur in the school's main building and auditorium in the western portion of the campus.

Project Location – City:

Los Angeles

Project Location – County:

Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project:

The Project entails interior alterations to approximately 1,737 square-feet within the school's existing main building and auditorium to expand the medical and mental health care services offered by the existing clinic at Holmes Avenue ES. The Project will be limited to interior alterations. No increases in student enrollment or campus growth are proposed as part of this Project.

The Project will be constructed per Division of State Architect approved design specifications. The Project will be implemented per all applicable local and State regulations, the Americans with Disabilities Act (ADA), as well as all District Standards and Specifications; such as those provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program (Program EIR),¹ which was completed in compliance with the California Environmental

¹ LAUSD OEHS. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015

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Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.

Our Vision: To eliminate all environmental, health, and safety risks at schools.

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Quality Act (CEQA). The beneficiaries of this Project include the District's students and staff as well as families, school supporters and the community at large who may be served by the wellness center.

Name of Public Agency Approving the Project:

Los Angeles Unified School District

Name of Person or Agency Carrying Out Project:

Los Angeles Unified School District

Exempt Status: (check one below)

- Ministerial [Public Resources Code (PRC) Section 21080(b)(1); CEQA Guidelines Section 15268²];
- Declared Emergency [PRC Section 21080(b)(3); CEQA Guidelines Section 15269(a)];
- Emergency Project [PRC Section 21080(b)(4); CEQA Guidelines Section 15269(b)(c)];
- Categorical Exemption (PRC Section 21084; CEQA Guidelines Sections 15300 -15333):
- *CEQA Guidelines Section 15301 – Existing Facilities*
 - *CEQA Guidelines Section 15303 – New Construction or Conversion of Small Structures*
 - *CEQA Guidelines Section 15314 – Minor Addition to Schools*
- Statutory Exemption:

Reasons why project is exempt:

Section 15301 – Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

The Project entails interior alterations to approximately 1,737 square-feet of an existing building located on an elementary school campus. The Project will not require or result in the growth of enrollment or capacity of the student population or campus. While the Project is designed to expand the services provided by the existing clinic, the Project is not designed to increase student enrollment. The Project will be constructed completely within the boundaries of the existing campus and will not require or result in the expansion of use beyond the campus. The remaining campus will not be adversely impacted or altered as a result of the Project. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15301.

Section 15303 – New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

The Project entails interior alterations to approximately 1,737 square-feet of an existing building to expand the services offered by the existing clinic. No modifications will be made to the exterior of the building. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

Section 15314 – Minor Addition to Schools

² CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 - Section 15387.

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Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

The Project entails interior alterations to approximately 1,737 square-feet of an existing building. The Project is not designed to increase the student enrollment or capacity and does not include the addition of any new classrooms. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15314.

Section 15300.2 – Exceptions

Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of the Project indicates that it will not violate any of the exceptions, as described in the following section.

1. *The project will occur in certain specified sensitive environments or locations;*

The Project will occur on an existing campus that is located within an urban setting. The surrounding uses are multi-family residential and industrial.³ The campus and the surrounding area have not been designated as a biologically sensitive site or location and do not contain sensitive resources or habitat that will be impacted by the Project. The nearest sensitive habitat is located more than 8 miles east-northeast of the campus and is designated as a critical habitat area for the Federally Threatened Coastal California Gnatcatcher (*Poliophtila californica californica*: Federally Threatened) and as the Puente Hills Significant Ecological Area (SEA).^{4,5} As such, the Project will not have the potential to impact any sensitive environments or locations.

2. *Cumulative impacts will be considerable because successive projects of the same type will occur at the same place over time;*

LAUSD is proceeding with wellness center projects at other LAUSD campuses. So, while there will be successive projects of the same type, they will not occur at Holmes Avenue ES. Therefore, there will be no cumulative impacts because of successive projects of the same type occurring at the same place over time.

3. *There is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances;*

There are no known unusual circumstances associated with the Project that will have a significant effect on the environment. The Project is not expected to require ground disturbance or soil excavation. If construction or earthmoving activities require import or export of soils and materials, LAUSD's Office of Environmental Health & Safety (OEHS) must be notified to provide oversight to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524 and applicable environmental agency rules and requirements.⁶ LAUSD will ensure that all construction related activities comply with the applicable LAUSD Standard Conditions of Approval which include but are not limited to:⁷ SC-USS-1, which requires that any construction waste will be recycled to the maximum extent feasible.⁸ Therefore, no reasonable possibility exists that the Project will have a significant effect on the environment due to unusual circumstances.

³ City of Los Angeles. ZIMAS. Available at: <http://zimas.lacity.org/>. Accessed April 2017.

⁴ US Fish and Wildlife Service. FWS Maps. Available at: <https://ecos.fws.gov/>. Accessed April 2017.

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed April 2017

⁶ LAUSD. Specification 01 5424. Available at: http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁷ LAUSD OEHS. 2015. School Upgrade Program Final Environmental Impact Report, <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015.

⁸ Ibid.

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4. *The project may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources within a highway officially designated as a scenic highway;*

The Holmes Avenue ES campus is located approximately 15 miles south of State Route 2 (SR 2), the nearest officially designated State scenic highway.⁹ The Project will not be visible from SR 2. In addition, the Project would not result in the removal of historic buildings, rock outcroppings, or other scenic resources. Therefore, the Project would not result in damage to scenic resources or similar resources within a highway officially designated as a state scenic highway.

5. *The project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code; or*

The Project will occur on an existing school campus which is not included on any list compiled pursuant to Section 65962.5 of the Government Code.¹⁰ Therefore, the Project will not have an impact related to being located on a hazardous waste site.

6. *The project may cause a substantial adverse change in the significance of a historic resource.*

Holmes Avenue ES was found to be eligible for listing in the National Register of Historic Places and the California Register of Historic Resources.¹¹ As stated previously, the Project is located in the main building and auditorium of the Holmes Avenue ES. The main building and auditorium are part of the original campus and, therefore, the Project will be in a historic building. Where the project affects historically significant features and materials ("character-defining features"), the work shall follow the Secretary of the Interior's Standards and LAUSD Design Guidelines and Treatment Approaches for Historic Schools.^{12,13} The project shall avoid removing, destroying, or obstructing any historic character-defining features, shall use the least invasive methods for all work involving character-defining features, and shall ensure that any new additions, materials, or features are compatible with the historic character of the school. The OEHS Historic Preservation Specialist will review project drawings and participate in design team meetings to ensure ongoing compliance with applicable standards.

In accordance with CEQA Guidelines Section 15064.5(b)(3), a project that has been determined to conform with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *SOI Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* is generally considered to be a project that will not cause a significant adverse impact and material impairment (14 CCR Section 15126.4(b)(1)). If a project meets the *Secretary's Standards*, the project can, in most cases, be considered categorically exempt from CEQA (14 CCR Section 15331) and qualify for a Notice of Exemption.

The Project will conform with the SOI Standards and does not entail components that will adversely impact the historic significance of the campus. As such, the Project does not have the potential to cause a substantial adverse change to a historic resource.

⁹ California Department of Transportation. California Scenic Highway Mapping System. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed April 2017.

¹⁰ California Department of Toxic Substances Control. DTSC Databases. Available at: <http://www.dtsc.ca.gov/database/>. Accessed April 2017.

¹¹ The most recent finding that Holmes Avenue ES is eligible for the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) was documented in: Los Angeles Department of City Planning. March 2012. "SurveyLA, Los Angeles Historic Resources Survey, Southeast Los Angeles, Individual Resources, 51st Elementary School (now Holmes Avenue ES)," pp. 88-89.

¹² National Park Service, Department of the Interior, Washington, DC. 1995. *The Secretary of the Interior's Standards for Rehabilitation, with Guidelines for Rehabilitating, Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*.

¹³ LAUSD OEHS. 2015. *Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools*. Los Angeles, CA.

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Signed by:



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Date:

